

Procedure for Review and Approval of Online Educational Services that Require Personally Identifiable Information (PII) of Students

Pursuant to 6A-1.09550, F.A.C., Student Online Personal Information Protection, section 3 (Review and Approval of Online Educational Services), The School Board of Broward County, Florida (SBBC) will follow these procedures for all online educational services it requires students or parents/guardians to use. These procedures are designed to protect student PII from potential misuse and to protect students from data mining and targeted advertising:

1. The Director of Planning, Implementation, Transition, Adoption, and Continuous Improvement (PITAC) or designee within the Information and Technology Department will review and approve all online educational services, prior to SBBC entering into an agreement with the supplier (provider of the online service). Those departments seeking approval for software for new educational services should submit their requests to pitac@browardschools.com for review.
2. For all online educational services and products that involve disclosures of education records, SBBC will enter into written agreements with the suppliers that include safeguards pertaining to the student PII.
3. SBBC expressly prohibits using any online educational service that will share or sell a student's PII for commercial purposes, including but not limited to targeted advertising, without providing parents a means to either consent or disapprove.
 - a. SBBC has an internal review process (for the online educational services it uses) which ensures the protection of all personally identifiable information. The IT Department oversees this process.
 - b. The disclosure prohibition herein does not prevent the purchase, merger, or other type of acquisition of a third-party provider or online educational service by another entity, provided that the successor entity continues to be subject to the provisions of this rule with respect to previously acquired PII.
4. Written agreements are reviewed in SBBC's contract review process, which includes review and approval by a designee within IT Security, Risk Management (Privacy Officer), and the Office of General Counsel for compliance with state and federal privacy laws. SBBC's Vendor Safeguarding the Confidentiality of Education Records section in agreements includes a clause that prohibits the supplier from sharing or selling a student's PII for commercial purposes, including but not limited to targeted advertising.
5. Once the agreement is Board approved, the Academics Department will collect the approved agreement, as well as identify which agreements are required for educational use, and provide hyperlinks to the terms of service and privacy policy for all suppliers who need to collect student PII. This applies to all software that students or their parents/guardians are required to use as part of a school activity or function.

6. On a monthly basis, the Information & Technology Department will update the internal list of approved software.
7. On a monthly basis, the Information & Technology Department will post updates to the full list of approved software used throughout SBBC, which is available on the Academic Department's website (<https://www.browardschools.com/approvedsoftware>). In addition, Information & Technology will post updates to the school-specific lists of approved software on each school's website (for example, <https://www.browardschools.com/nobhill/software>).

These School Software lists include:

- a. Software Name
 - b. Vendor Name
 - c. Grade Level
 - d. SBBC Agreement
 - e. Vendor Terms and Conditions
8. For each required online educational service, parents/guardians and eligible students will be notified of each student's PII that will be collected, how it will be used, when and how it will be destroyed, and the terms of re-disclosure, if any, via the SBBC Agreement and Supplier Terms and Conditions fields within each School Software list entry on the District's Academic Department website and each school's website.
 9. For online educational services that students and parents are referred to as part of a school activity or function, but are **not** required to use, SBBC must provide notice to parents and eligible students if such online services have not been reviewed and approved in accordance with this procedure.
 10. In the annual FERPA notice in the Policy 5090, *Code of Student Conduct* as well as Policy 1480, *Student Records: Confidentiality and Family Educational Rights*, parents/guardians and eligible students will be notified that they can review School Software lists online on the SBBC's website and each school's website.